



*Office of Laboratory Licensure,
Certification & Training*

3443 N Central Avenue, Suite 810
Phoenix, Arizona 85012
(602) 255-3454
(602) 255-1070 FAX
Technical Support Hot-Line 1-800-592-0374
[E-Mail: acharyp@azdhs.gov](mailto:acharyp@azdhs.gov)

Jane Dee Hull, Governor
James R. Allen, MD, MPH, Director

Information Update

**May 1, 1997
Update # 36**

1. Following are excerpts from a memorandum dated April 8, 1997 received by the Office of Laboratory Licensure from EPA Region IX on the approval status of the Method 1664.
 - At present the only analytical method approved for oil and grease monitoring under the Federal and State NPDES and Pretreatment Programs is EPA Method 413.1. The memorandum is a written response to the numerous laboratory requests EPA received to change Method 413.1 to Method 1664, before it is promulgated, due to the difficulty and expense of obtaining Freon. Method 1664 uses hexane as the extraction solvent. It is currently moving through the approval process for NPDES and Pretreatment compliance monitoring and is proposed to replace Method 413.1.
 - US EPA Region IX will approve interim limited use of EPA Method 1664 for the analysis of oil and grease on a case-by-case basis. The interim approval will be valid until Method 1664 is officially promulgated as a final rule in the Federal Register or is withdrawn from consideration by EPA.
 - The results obtained by this method may not be comparable to those obtained by using Method 413.1 due to the difference in extraction efficiency of the two solvents. It is important to be aware that EPA Region IX, State or Pretreatment Control Authorities may take enforcement action based on the results that exceed permit limits. Although most requests have come from laboratories, because of the compliance issue, Region IX will only accept requests to use Method 1664 from the discharger. Region IX will send a notification of approval to the applicant after review of the application.
 - The restrictions and requirements of Region IX's case-by-case interim limited use approval of Method 1664 are summarized below:
 - a. Interim limited approval is valid until Method 1664 is officially promulgated or is withdrawn. If Method 1664 is withdrawn, dischargers using Method 1664 must return to the previously approved method (i.e., Method 413.1 or its replacement).
 - b. Approval of the method will be limited to the discharger for which approval is issued and only in the states and territories within Region IX.

- c. Dischargers must acknowledge that results obtained using Method 1664 may differ from those of 413.1 and must agree to report and be bound by the results of the method for purposes of determining NPDES compliance and/or pretreatment compliance.
 - d. Dischargers must use a laboratory certified by the state to perform oil and grease analyses by the methods identified in 40 CFR Part 136.3.
 - e. The exact date of change to Method 1664 must be documented by the discharger.
 - f. Method 1664 must be used without modifications by the laboratory. If modifications noted in the Method are exercised, the laboratory must apply to the Region through the ATP process identified in 40 CFR Part 136.5.
- o Dischargers may wish to have laboratories perform side-by-side analysis using both methods on the same samples should comparison of results become necessary in the future.
 - o Direct any questions to Vance Fong, Quality Assurance Program Manager at (415) 744-1492 or Robert Wills, CWA Compliance Advisor at (415) 744-1910.

A note from the Arizona Office of Laboratory Licensure: The laboratories must send in requests for certification of the Method 1664 to the Office of Laboratory Licensure before running the test for compliance samples.

2. **Summary of EPA's Fact Sheet (EPA-821-F-97-001, January 1997): Streamlining EPA's Test Methods Approval Program:**

EPA is proposing a regulation to streamline EPA's program for approving laboratory test procedures and quality control measures that are used to gather data and monitor compliance under the Clean Water Act (CWA) and the Safe Drinking Water Act (SDWA). It demonstrates EPA's commitment to reducing the regulatory burden imposed on industries and municipalities, the technology development community, and the laboratory services community. It also demonstrates EPA's commitment to lowering the barriers to innovative technology.

The proposed regulation will make it easier for the affected communities to modify an approved reference method by streamlining the regulatory requirements and it will provide an opportunity for non-EPA organizations to develop and gain approval of entirely new methods. The objective of the proposal is to encourage early introduction and use of innovative technologies that reduce costs, overcome analytical difficulties, and enhance data quality. The proposal safeguards to ensure that method modifications produce data of equivalent or superior quality to the data produced by approved methods.

The proposed streamlining rule;

1. increases the flexibility of affected parties to modify existing test procedures without regulatory action
2. expedites approval of new and modified test procedures
3. establishes and requires the use of standardized Quality Control (QC) and QC acceptance criteria

4. recommends use of standard data elements for reporting test results.

This proposal sets the stage for harmonization of waste and drinking water test procedures.

EPA has developed three supporting documents listed below to help the regulated community implement this regulation and the copies can be obtained through the U.S. EPA National Center for Environmental Publications and Information (NCEPI), 11029 Kenwood Road, Cincinnati, OH 45242 (phone: 513-489-8190). The complete text of the Federal Register notice containing the streamlining proposal and the full text of the supporting documents may also be viewed or downloaded on the Internet at <http://www.epa.gov/ost> (Select "Rules open for public comment" and then select the documents listed below).

1. Guide to Method Flexibility and Approval of EPA Water Methods (EPA-821-D-96-004)
2. Guidelines and Format for Methods to be Proposed in 40 CFR Part 136 or 141 (EPA-821-B-96-003)
3. Methods for Organic Chemical Analysis of Municipal and Industrial Wastewater (EPA-821-B-96-005)

For additional information concerning this action you may also contact Marion Thompson at U.S. EPA Office of Water, Engineering and Analysis Division (4303), 401 M Street, S.W. Washington, D.C. 20460 (phone: 202-260-7117).

3. Notice of Approved/Accepted Methods by EPA

1. revised December 30, 1996 versions of Palintest Method Nos. 5001 and 5002 for determining free and total chlorine in potable water; are acceptable versions of Standard Method 4500 Cl-G, approved by EPA for determining free and total chlorine in drinking water monitoring.
2. Perkin Elmer Method ENVA - 100, "The Application of Flow Injection Technology to Automating Cold Vapor Mercury Analysis", dated January 9, 1997; is an acceptable version of the 1994 version of Method 245.1, approved by EPA for determining mercury in drinking water.
3. Hach Method No. 8370, Revision 1, dated 10/8/96; is an acceptable version of approved 18th Edition Standard Method 4500-Cl-G for Total Chlorine in drinking water.

Contact Roseanne Sakamoto, Environmental Scientist, Quality Assurance Office, PMD-3, Region IX, USEPA at 415-744-1535, if you have questions.

4. A free audio conference on "Cryptosporidium and Water" sponsored by Public Health Foundation, Washington D.C. will be held on May 20, 1997, from 12:45 to 2:45 pm, at the State Laboratory library, First floor, 1520, W. Adams, Phoenix. Please call Cristy at (602)- 255-3454 to register.
5. Closing arguments for the Arizona Department of Health Services' Administrative Hearing for the proposed Notice of Suspension, Civil Penalties, and Revocation of Westech's Laboratory License is scheduled for May 6, 1997 at 9:30 a.m. The location for this Hearing will be held at 1647 East Morten, Phoenix, Arizona. The Hearing Officer, Timothy Barnes/ALJ further ordered that the parties shall file (and exchange) Proposed Findings of Fact, Conclusions of Law and Recommended Decision at this Hearing. Any questions should be directed to Steven Baker, Environmental Laboratory Program Manager at (602) 255-3454.

6. Request participation from environmental community:

Public Health is in a stage where it has become crucial that its mission and roles be included in the creation of the new "integrated health system". Both medical and environmental health professionals from public health, environmental and clinical laboratories are challenged to be participants in this "re-invention" process.

The Center for Disease Control and Prevention (CDC) and the Association of State and Territorial Public Health Laboratory Directors (ASTPHLD) have formed a "Partnership for the Future: Exploring Roles of Public Health Laboratories". This partnership provides a forum to bring together public and private sector leaders and other stakeholders, to discuss the future of public health in relation to public health laboratories and establish a framework to build a common understanding of the challenges facing public health laboratories.

Two live interactive video broadcasts, the first aired on March 26, 1997 and the second to be aired on May 15, 1997, are meant to develop and strengthen the partnerships with key stakeholders. We have been challenged to develop a business plan to take a proactive stance for public health in Arizona. Your input into this process of developing the core functions of a public health laboratory in Arizona, which are "assessment", "policy development" and "assurance", is requested.

Any person interested in participating in this Program may obtain additional information from Wyn Nimmo, program coordinator, at (602) 255-3454.

7. If you have any questions regarding the Updates, or if you have any technical questions that need clarification, please call or send [e-mail](#) to Prabha Acharya, Program Manager, Technical Resources and Training at the Laboratory Licensure. A [table of contents](#) to all the Information Updates published is also available.

Permission to quote from or reproduce materials from this publication is granted when due acknowledgment is made.

This message is available in alternative format by contacting Wesley Press at (602) 542-0357
The [Arizona Department of Health Services](#) does not discriminate on the basis of disability in administration of its programs and services as prescribed by Title II of the Americans with Disability Act of 1990 and Section 504 of the Rehabilitation Act of 1973.